

REMARKS

The Office Action dated June 6, 2005 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto. Claims 1-12 are currently pending in the application and are respectfully submitted for consideration.

In the Office Action, claims 1-12 were rejected under 35 U.S.C. §102(e) as being anticipated by Erimli (U.S. Patent No. 6,760,341). The rejection is respectfully traversed for the reasons which follow.

Claim 1, upon which claims 2 and 3 are dependent, recites a system of switches. The system includes a memory/command bus having a first interface, a second interface and a third interface, and a memory connected to the third interface of the memory/command bus, the memory having a first memory address. The system further includes a first switch that monitors the memory/command bus and interprets information written to the first memory address as proxy information, the first switch connected to the first interface of the memory/command bus, and a second switch that monitors the memory/command bus and interprets information written to the first memory address as proxy information, the second switch connected to the second interface of the memory/command bus.

Claim 4, upon which claims 5-9 are dependent, recites a switch including a memory/command bus interface, the memory/command bus interface configured to be connected to a memory and a second switch through a memory/command bus, the memory having a designated memory address. The switch also includes a monitor

connected to the memory/command bus interface so that the monitor can monitor the memory/command bus and interpret information written to the designated memory address as proxy information.

Claim 10, upon which claims 11 and 12 are dependent, recites a method of sending information between switches using a shared memory/command bus connecting the switches to one another and to a shared memory. The method includes the steps of allocating a first address in the shared memory for communicating information between switches, obtaining ownership of the memory/command bus for a first switch, writing memory information to the shared memory from the first switch, writing sending information, to be sent to other switches, to said first address in said shared memory, monitoring of the memory/command bus by the first switch and the other switches, and interpreting the sending information written to the first address as proxy information.

As will be discussed below, Erimli fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the features discussed above.

Erimli discloses a network switching system with has a plurality of multiport switch modules and connected buffer memory devices. The system assigns, in each of the buffer memory devices, a memory segment for storage of frame data from a corresponding one of the switch modules. Each memory device is divided into memory segments that are configured for storing frame data from a corresponding one of the switch modules. Thus, each switch module is configured for writing frame data, for a data frame received on one of the corresponding switch ports, into the corresponding

assigned memory segment of each of the buffer memory devices. Any one of the switch modules can access any location of the buffer memory devices, enabling any one switch module to retrieve frame data from the buffer memory devices that was stored by another one of the switch modules. In addition, the assignment of memory segments enables a switch module having accessed frame data from the buffer memory to determine the switch module that originally stored the frame data based on the location of the stored frame data within one of the memory segments.

Applicants respectfully submit that Erimli fails to disclose or suggest all of the elements of the currently pending claims. Specifically, Applicants respectfully submit that Erimli fails to disclose or suggest a switch or monitor that interprets information written to the memory address as proxy information, as recited in present claims 1, 4, and 10. Rather, Erimli only discloses a network switching system 20 which includes a plurality of buffer memory devices 36 connected to multiport switches 22, and a data bus 38 configured to pass frame data between the switch modules 22. The network switch port 22 having received the data packet 22a stores the received data frame using a shared memory arrangement, where a corresponding portion of the data frame is stored in each of the buffer memory devices 36 at the same prescribed location within a memory segment 40 assigned to the corresponding switch module 22 (Erimli, Column 5, lines 20-42). Erimli, however, clearly fails to disclose or suggest that a switch or monitor interprets information written to a memory address as proxy information.

According to an embodiment of the claimed invention, as illustrated in Figure 5, the memory/command bus 530 may be used to send commands between switch 510 and switch 520 during a write to ATM memory 535. Information or commands are written to a specific address A in ATM memory 535 during write cycles. Switches 510 and 520 will recognize write operations to address A as a command during a write cycle. Information written to address A is called proxy information, which is defined as information written to memory that is not interpreted by a switch as information being written to memory. Instead, the switch interprets proxy information being written to memory as commands, status information that a switch may use to set a register or LED, or other types of information not typically written to memory. Applicants respectfully submit that Erimli fails to disclose or suggest such proxy information, and therefore fails to disclose or suggest a switch or monitor that interprets information written to a memory address as proxy information, as recited in present claims 1, 4, and 10.

For at least the reasons discussed above, Applicants respectfully request that the rejection of claims 1, 4, and 10 be reconsidered and withdrawn. Furthermore, claims 2-3, 5-9, and 11-12 are dependent upon claims 1, 4, and 10, respectively. Thus, claims 2-3, 5-9, and 11-12 should also be allowed for at least their dependence upon claims 1, 4, and 10, and for the specific limitations recited therein.

Applicants respectfully submit that the cited prior art fails to disclose or suggest critical and important elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is

therefore respectfully requested that all of claims 1-12 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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